REMARKS

1. Applicants Submit that the Drawings in their Current Form Are in Compliance

The Examiner objected to the drawings, especially FIG. 6, on the grounds that there is no "start" box although there is an "end" box. (Final Office Action, pgs. 2-3) Applicants submit that based on the disclosure it is clear that the "start" box is box 200 in FIG. 6. In fact, the Specification defines box 200 as the "start" point. According to the Specification, "With respect to FIG. 6, control begins at block 200...." (Specification, pg. 7, para. [0020]). Applicants submit that the Examiner has not shown any requirement that a flowchart specifically show both a start and end box. Further, the Specification when read with the figures clearly defines box 200 as a start point where "control begins". For these reasons, Applicants traverse the Examiner's objections to the drawings and submit that no amendment is required because one skilled in the art upon reviewing the drawings and the Specification would understand box 200 in FIG. 6 to be a "start point".

Accordingly, Applicants request that the Examiner withdraw the objection to the drawings.

2. The Claims Comply With 35 U.S.C. §112, par. 2

The Examiner rejected claims 3, 11-14, 19, 27-30, 43-46, 35, 50, 51, 52, and 54 as indefinite under 35 U.S.C. §112, par. 2. Applicants have amended certain of these rejected claims to overcome the rejection and traverse the rejection with respect to other claims. Applicants request entry of these amendments because the amendments do not require further searching.

Applicants amended claims 3, 19, and 35 to change their dependency to a pending claim.

Applicants amended claim 51 to change the dependency to a system claim.

With respect to claims 11, 27, and 43, the Examiner found that these claims are not understood because "[i]t seems that the metadata file is already fully constructed for the method to access at line 3." (Final Office Action, pg. 3).

Applicants amended these claims to recite that the assembling is performed with respect to a"multimedia file", not the "metadata file" as the Examiner notes. The Specification discloses

reconstructing the MXF file 144 to include the metadata objects and the essence. (Specification, pg. 11, para. [0023]) Applicants submit that this amendment overcomes the Examiner's objection by clarifying that the assembly occurs with respect to a reconstructed multimedia file, not a metadata file.

With respect to claims 50, 52, and 54, lines 4-5, the Examiner asked "[h]ow is the universal label at line 3 related to the leaf universal labels of line 4". (Final Office Action, pg. 3) The claim states that a "universal label in the metadata object comprises a node having values defined by leaf universal labels" or a leaf of one node. Thus, according to the claims a universal label is either (1) a node that has values defined by leaf universal labels or (2) is a leaf universal label. This point is further disclosed in the Specification, which states that a universal label is a node or a leaf. (Specification, pg. 7, line 3-5) According to the Specification, if the universal label is a node, then it "has values defined by leaf universal labels". Leaf universal labels provide the actual values. (Specification, pg. 7, lines 5-7) Accordingly, Applicants believe this claim language is not awkward and clearly states that a universal label comprises either (1) a node having values defined by leaf universal labels or (2) is a leaf universal label. Applicants request that the Examiner withdraw any indefiniteness rejection with respect to these claims.

Accordingly, Applicants request the Examiner to enter the amendments that make minor corrections to overcome the indefiniteness rejection and withdraw the indefiniteness rejection with respect to all the rejected claims.

3. Claims 1, 3, 9-14, 17, 19, 25-30, 33, 35, 41-46, 49, 51, and 53 are Patentable Over the Cited Art

The Examiner rejected claims 1, 3, 9-14, 17, 19, 25-30, 33, 35, 41-46, 49, 51, and 53 as obvious (35 U.S.C. §103) over McGrath (U.S. 2002/0116392). Applicants traverse for the following reasons.

Claims 1, 17, and 33 concern storing data in a data store and require: receiving a multimedia file including essence, metadata objects providing information on the essence, and a unique identifier assigned to the essence; extracting the essence from the file; storing the essence in the data store; for each received metadata data object in the first file, performing: determining whether the metadata object includes a label or attribute of a label; adding a tagged element to a

metadata file corresponding to the label metadata if the metadata object includes one label; and adding a tagged attribute to the metadata file if the metadata object includes one attribute for one label, wherein the tagged attribute indicates an attribute value for one tagged element corresponding to the label for which the value is provided; and storing the metadata file in the data store.

The Examiner cited paragraphs [0049-0050] of McGrath as teaching the claim requirements of for each received metadata data object in the first file, performing: determining whether the metadata object includes a label or attribute of a label; adding a tagged element to a metadata file corresponding to the label metadata if the metadata object includes one label; and adding a tagged attribute to the metadata file if the metadata object includes one attribute for one label, wherein the tagged attribute indicates an attribute value for one tagged element corresponding to the label for which the value is provided; and storing the metadata file in the data store. (Final Office Action, pgs. 4-5)

Paragraph [0048] mentions that a server responds to a search request by returning an XML file having metadata for video clips that match the search request. XML is the preferred markup language for interchange of data between the client and the databases. Paragraph [0049] discusses general principles of XML, such as it having tags defining an information structure. Paragraph [0050] discusses how the XML file has"metadata objects" elements that have information on the video and "metadata tracks" elements that provide an index to images on a clip in which the particular metadata object is associated. The cited index to the images in which an object appears allows downloading of only a subset of images in which the metadata object appears.

Although the cited McGrath discusses how metadata for video files matching a search request is maintained in an XML file, nowhere does the cited McGrath anywhere teach or suggest determining whether a metadata object includes a label or attribute of a label and then adding a tagged element to a metadata file for the label or adding a tagged attribute if the metadata object includes one attribute for one label. The claims provide specific operations for constructing a metadata file from metadata objects in a multimedia file, where a tagged element is added to the metadata file if the metadata object is a label and a tagged attribute is added to the metadata file if the metadata object includes an attribute for one label. Nowhere does the cited

McGrath anywhere teach or suggest these specific operations for adding tagged elements and attributes for metadata objects in a metadata file. Instead, the cited McGrath discusses an XML file having metadata on video clips that match a search request.

For example, although the cited McGrath discusses how an XML file has metadata on video clips matching a search request, the cited McGrath nowhere teaches or suggests the specific claim requirements of adding a tagged element for a metadata object including a label and adding a tagged attribute for one metadata object including an attribute, where a metadata file includes these metadata objects. .

Further, the cited McGrath does not teach or suggest forming its XML file from metadata objects from a multimedia file including the essence and metadata objects, such that the essence is stored in the data store and tagged elements and tagged metadata objects are added to a separate metadata file for metadata objects in the metadata file. Nowhere does the cited McGrath teach extracting both the essence and metadata objects, and then forming a metadata file for the metadata objects as claimed. Instead, McGrath forms an XML file to return search results to a client search request, having metadata object elements having text descriptions of objects that appear in the images and metadata tracks having an index to images.

Further, the claims require storing the metadata file in the data store including the essence. McGrath teaches away from storing the XML file with the actual video/essence because the XML file is sent to the client to interchange data.

Accordingly, Applicants submit that claims 1, 17, and 33 are patentable over the cited art because the cited McGrath does not teach or suggest the requirements of these claims.

Applicants submit that dependent claims 3, 9, 11, 13, 14, 19, 25, 27, 35, 41, and 43 are patentable over the cited art because they depend from one of claims 1, 17, and 33, which are patentable over the cited art for the reasons discussed above. Moreover, the below discussed claims provide additional grounds of patentabiltiy over the cited art.

Claims 3, 19, and 35 depend from claims 1, 17, and 33 and further require that one separate metadata file including tagged elements and attributes is generated for each received multimedia file.

The Examiner stated that since the UMID is unique, one separate metadata file is generated for each received multimedia file. (Final Office Action, pg. 5) Applicants traverse.

McGrath mentions that an "XML file containing metadata for the video clips which match a user's search request." (McGrath, pg. 3, para [0048]). Thus, the XML file in McGrath has metadata for multiple video clips. This teaches away from the claim requirement of one separate metadata file having tagged elements and attributes for each received multimedia file with an essence because McGrath has information on multiple video clips satisfying the search request in one XML file, not metadata for one essence in one metadata file.

Accordingly, claims 3, 19, and 35 provide additional grounds of patentability over the cited art because the additional requirements of these claims are not taught or suggested in the cited McGrath.

Amended claims 11, 27, and 43 depend from claims 1, 17, and 33 and further require: receiving a unique identifier; accessing the essence and the metadata file associated with the unique identifier; generating one reconstructed metadata object for each tagged element and attribute in the metadata file; and assembling a reconstructed multimedia file including the reconstructed metadata objects, the accessed essence, and the received unique identifier.

The Examiner found that McGrath taught the above claim requirements without citing any specific section of McGrath, except saying "see the whole document". Applicants submit that the Examiner has not cited any particular section of McGrath that teaches reconstructing a metadata object from tagged elements and attributes in a metadata file and then assembling a reconstructed multimedia file to include the reconstructed metadata objects and the essence. Instead, the cited McGrath concerns creating an XML file to exchange metadata on video clips satisfying a search request. Nowhere does the cited McGrath anywhere teach or suggest the claim requirements for reconstructing metadata objects from a metadata file, e.g., XML file, and then adding the reconstructed metadata objects and essence to a reconstructed metadata file.

Accordingly, claims 11, 27, and 43 provide additional grounds of patentability over the cited art because the additional requirements of these claims are not taught or suggested in the cited McGrath.

With respect to claims 12, 13, and 14, the Examiner states that McGrath teaches the claimed details for reconstructing the metadata objects. However, the Examiner has not cited any part of McGrath that teaches or suggests reconstructing metadata objects from attributes and elements in a metadata file as claimed. Instead, the cited McGrath concerns returning an XML

file having metadata on video clips matching a search request. If the Examiner maintains this rejection, Applicants request that the Examiner cite specific sections of McGrath that teach or suggest the claim requirements of reconstructing metadata objects from elements and attributes in a metadata file, and then adding the reconstructed metadata objects and essence to a reconstructed multimedia file.

Accordingly, claims 12, 13, and 14 (as well as corresponding system and article of manufacture claims 28-30 and 44-46) provide additional grounds of patentability over the cited art because the additional requirements of these claims are not taught or suggested in the cited McGrath.

Dated: November 23, 2005

By: _____
David W. Victor
Registration No. 39,867

Please direct all correspondences to:

David Victor
Konrad Raynes & Victor, LLP
315 South Beverly Drive, Ste. 210
Beverly Hills, CA 90212
Tel: 310-553-7977
Fax: 310-556-7984